**PLATFORM JOINT HOLDER'S PRIVACY STATEMENT**

1. The Concessionaire and the other companies listed in the table below (collectively, the "Joint Holders") have entered into a Joint Holding Agreement concerning the shared use of the Platform in accordance with Article 26 of the GDPR. Together, they determine the purposes and means of the joint processing of personal data managed via the Platform. In accordance with Articles 13 et seq. of the GDPR, we hereby inform you, as Data Subject, of the purposes and processing methods enforced by the Joint Holders as listed below, together with their respective websites:

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|---|---|---|
| ASTI CUNEO | A33 Asti – Cuneo | https://www.asticuneo.it/ |
| AUTOSTRADA DEI FIORI | A6 Torino-Savona | https://www.autostradadeifiori.it/ |
| AUTOVIA PADANA | A21 Piacenza – Brescia | https://www.autoviapadana.it/ |
| BREBEMI | A35 Brescia-Bergamo-Milano | https://www.brebemi.it/profilo-aziendale/ |
| CONCESSIONI DEL TIRRENO | A10 Savona – Ventimiglia | https://www.concessionideltirreno.it/ |
| | A12 Sestri Levante - Livorno | |
| | A11/A12 Viareggio - Lucca | |
| | A15 branch road to La Spezia | |
| IVREA TORINO PIACENZA ( ITP) | A5 Torino-Ivrea-Quincinetto motorway, A4/A5 Ivrea–Santhià link road, Torino-Pinerolo branch road, and Torino Sistema Tangenziale Esterna (SATT-Ring Road System) | https://www.itpspa.it/ |
| | A21 Torino-Alessandria-Piacenza | |
| MILANO SERRAVALLE - MILANO TANGENZIALI | A7- Milano - Serravalle Scrivia, A50 Tangenziale Ovest, A51 Tangenziale Est, A52 Tangenziale Nord. | https://www.serravalle.it/ |
| SALT | A15 Parma – La Spezia | https://www.salt.it/ |
| SATAP | A4 Torino – Milano | https://www.satapweb.it/ |
| SAV | A5 Quincinetto – Aosta | https://www.sav-a5.it/ |
| SITAF | T4 Frejus Tunnel | https://www.sitaf.it/ |
| | A32 Torino – Bardonecchia | |
| TE | A58 Tangenziale Esterna di Milano (Milan Outer Ring Road) | https://www.tangenziale.esterna.it/ |

2. The data entered on the Platform while registering or at a later time, pursuant to Sections 4.1.2, 4.1.3 and 4.2.1, where applicable, and any Platform browsing data (e.g., technical cookies) (hereinafter referred to as the "Platform-Provided Personal Data") may be used and processed by each Joint Holder – digitally and electronically – through their own data processors authorised to carry out the relevant processing operations.

Data collected this way shall be processed solely for purposes relating to the use of the Platform's features, through which each Concessionaire may process your refund request for the relevant motorway stretch as independent Data Controller. For this purpose, please refer to the specific Privacy Statement published on the website of each Concessionaire.

3. Platform-Provided Personal Data acquired and processed by the Joint Holder Concessionaires shall not be transferred to third parties for commercial purposes. We hereby inform you that the Concessionaire may process data relating to the Platform use - for statistical purposes and to monitor the proper operation of the Platform - in a completely anonymous and aggregate form that will not allow user identification, in any way.
4. Pursuant to Article 6(1)(c) and (f) of the GDPR, the legal bases for the processing are, respectively:
   (i) Legal obligation (Article 6(1)(c)): the need to comply with and fulfil legal obligations as a motorway company, pursuant to Transport Regulation Authority's Resolution 132/24, as amended by Resolution 211/25 (technical and administrative management of refunds; competent authorities' requests).
   (ii) Legitimate interest of the Joint Holder (Article 6(1)(f)): the need to ensure the Platform's proper operation.
5. Provision of the Platform-Provided Personal Data is mandatory for successful registration on the Platform and to allow each Concessionaire to process the refund claims independently. Therefore, failure to provide such data, or the provision of incomplete or inaccurate data, may result in the inability to process the refunds for claims made through the Platform.
6. Platform-Provided Personal Data may be processed by third parties appointed to provide services on behalf of the Joint Holder Concessionaires for this purpose, and designated as "Data Processors" pursuant to Article 28 of the GDPR.
7. Such data shall be retained for as long as necessary to ensure proper use of the Platform and the refund mechanisms, in accordance with the principle of data minimisation under Article 5(1)(c) of the GDPR.
8. The Concessionaire, acting as Joint Holder, shall retain Platform-Provided Personal Data for the purposes set out in Section 10.2, in accordance with the following terms:
   - Up to 24 months after its last use
   - Up to 24 months after registration, if the Platform is not used
9. For information on the retention periods for personal data processed by each Concessionaire acting as independent Data Controllers when managing the refund claims, please refer to each Privacy Statement published on each Concessionaire's website.
10. The Platform's Personal Data shall be managed and stored on servers located in Italy or within the European Union and will not be transferred outside the European Union.
11. The Data Subject may contact any of the Joint Holder Concessionaire to exercise their rights concerning Platform-Provided Personal Data, under Articles 15 et seq. of the GDPR.
12. The Data Subject is further entitled to file a complaint pursuant to Article 77 of the GDPR with the Data Protection Authority.
13. In accordance with the provisions of Regulation 2024/1689 (AI Act) and Law 132/2025 on artificial intelligence, it should be noted that the Platform also utilises artificial intelligence systems for certain functions, designed to better verify the consistency of the data entered and declared by the user against the documentation provided (e.g., on the identity document, details of the electronic toll service contract holder and electronic toll service device, which should match the invoices generated, and details contained in the payment receipts provided).

Artificial intelligence systems are used in full compliance with the applicable regulations specified above and with the GDPR.

14. For data processed by each Concessionaire, in its capacity as independent Data Controller, please refer to the specific Privacy Statements published on their websites, which also govern the processing of personal data provided in the refund claims sent by registered mail with return receipt, as referred to in Section 5.

*Last updated: May 2026*